

October 31, 2024

Garrett C. Varra
Raptor Materials, LLC.
8120 Gage Street
Frederick, CO 80516

**Re: Additional Information Required, Groundwater Monitoring Data 2024,
Two Rivers Sand, Gravel and Reservoir Project, Permit No. M-2022-013**

Dear Mr. Varra:

On July 5, 2024, the Division of Reclamation, Mining and Safety (Division/DRMS) received your Groundwater Monitoring Data for the Two Rivers Sand, Gravel and Reservoir Project. After review of the submission the Division has additional items that need to be addressed or clarified.

1. The water level data provided only has data from four months. In Section 2.2 of the Groundwater Monitoring Plan (March 2023) it is stated that water levels have been collected on a monthly basis since September 2015. Please provide the water level data that has been collected since September 2015.
2. In Section 2.2, of the Groundwater Monitoring Plan, it is stated that groundwater levels will be measured monthly during dewatering operations. However, in Section 2.3 it is stated that water levels from all wells will be measured on a monthly basis and shown in Table 1. Again, in Section 2.5 it is stated that water levels will be measured on a monthly basis. The water levels provided are for four months that appear to be quarterly measurements. Please explain the discrepancy between what was provided and what is in the approved plan.
3. In Section 2.4 the average of monthly water level data over a one-year period was to be inputted into the geostatistical software package Surfer®. Variations in premining groundwater levels were to be presented on a two-dimensional contour map and compared to numerical predictions and provided to the Division in the annual report which will be delivered during the first quarter after each sample year. All data and methods were to be presented in a report. This report was not submitted, please provide an update on the status of the report.
4. The field testing results do not clearly identify the location the tests were collected. Please update and resubmit the table to identify the location the data was collected.



5. The laboratory monitoring data submitted consisted of ten (10) laboratory data packages. A review of the associated chains-of-custody (COCs) indicate that not all the same locations were sampled. Data packages from March, June and September 2023 contain the results from samples collected from GW-12. However, in June 2023 there are two additional samples 1-GAP and 2-GAP. Data packages from December 2023 and March 2024 indicate samples were collected from sites 1 through 6 and 1 through 5, respectively. It is unclear which locations these samples correspond to. Please provide a detailed summary of the monitoring results, including but limited to appropriately identifying the locations the samples correspond to, a map showing the sample locations, any deviations from the approved sampling plan (e.g. samples not analyzed within the approved holding times), a table summarizing the samples results compared to the relevant water quality standards and a discussion of exceedances of water quality standards and how those exceedances relate to future monitoring and mining at the site.
6. On the COCs it is indicated that the samples are grab samples. Please clarify if samples were collected following the purging three to five well volumes from the monitoring well(s). Include with the response any relevant field documentation.
7. It does not appear, from the laboratory data provided, that any duplicate samples were collected during any of the field sampling. The Field and Laboratory Control section of the plan indicates a duplicate sample is to be taken. Please state whether duplicate samples were collected and if they were not, please clarify why.
8. Were the samples filtered at the time of collection or filtered at the laboratory?
9. A review of the permit file the Division was unable to determine where a formal point-of-compliance had been established and approved pursuant to Rule 3.1.7(6). If the Operator has that information, please provide it. Typically, the Division requires monitoring of up and down gradient wells to establish baseline conditions prior to establishing any point(s)-of-compliance.

Please respond to these items within 30 days of the date on this letter, by **November 30, 2024**. The Division reserves the right to further supplement this document with additional items and details as necessary.

If you need additional information or have any questions, please contact me by email at patrick.lennberg@state.co.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick Lennberg".

Patrick Lennberg
Environmental Protection Specialist

cc: Jared Ebert, DRMS

ec: Garrett Varra, Raptor Materials, LLC, gvarra@raptormaterialsllc.com
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